

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 11-10212-JLT
)	
1. JOHN WILLIS)	
a/k/a "Bac Guai John")	
2. BRANT WELTY)	
3. PETER MELENDEZ)	
a/k/a "Shrek")	
4. AIBUN ENG)	
5. BRIAN BOWES)	
6. KEVIN BARANOWSKI)	
7. MICHAEL CLEMENTE)	
a/k/a "Ricky Martin")	
9. MARK THOMPSON)	
12. BRIDGET WELTY)	
)	
Defendants.)	

FINAL STATUS REPORT

Pursuant to Local Rule 116.5(c), the United States of America and the undersigned defendants submit this joint status report in advance of the Final Status Conference scheduled for June 19, 2012.

1. Plea Status

The government and counsel for several defendants are in the midst of discussions which may result in resolution of the case as to that defendant without trial. At least as to some defendants, a resolution without trial appears likely. The parties will alert that Court as soon as a change of plea hearing become necessary.

2. Additional Discovery

The government is substantially up to date in its production of discovery. The government anticipates that it will produce additional information regarding newly-cooperating

defendants as such information becomes available and laboratory backup and qualifications of its expert witnesses, and any other expert disclosures, not less than 21 days before trial, as the Court previously ordered.

The defendants reserve the right to file for additional discovery in response to the government's production of new discovery.

Defendant Peter Melendez was arraigned on May 7, 2012 and has received initial automatic discovery. Defendant Melendez is still reserving automatic discovery and reserves the right to file for additional discovery in response to the government's production.

3. Discovery Requests

Defense counsel have had an opportunity to request additional discovery. There are no outstanding discovery requests.

3. Rule 12 Motions

The court set a discovery motion schedule at the hearing on May 24, 2012.

4. Speedy Trial Act Calculations

On May 3, 2012, the Court issued an Order excluding time from April 25 through May 24, 2012, as to all defendants except Melendez. On May 29, 2012, the Court issued an Order excluding time from May 24 through June 19, 2012. Accordingly, zero days have been counted and 70 days remain under the Speedy Trial Act. The parties request that the Court exclude the time between June 19, 2012, and the date of the next scheduled hearing.

5. Anticipated Trial

The United States estimates that, as the case is currently constituted, a trial would last three to four weeks.

6. Other Matters

The government anticipates seeking a superseding indictment charging a money laundering conspiracy as to the remaining defendants, which would likely happen in June.

Respectfully submitted,

JOHN WILLIS

By: R. Bradford Bailey
R. Bradford Bailey
Counsel for John Willis

AIBUN ENG

By: Neil F. Faigel
Neil F. Faigel
Counsel for Aibun Eng

BRIAN BOWES

By: Liam D. Scully
Liam D. Scully
Counsel for Brian Bowes

MICHAEL CLEMENTE

By: James J. Cipoletta
James J. Cipoletta
Counsel for Michael Clemente

Dated: June 12, 2012

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Timothy E. Moran
Timothy E. Moran